



VIA ECFS

March 5, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Attn: Wireline Competition Bureau

RE: W.C. Docket No. 10-90
Rural Broadband Experiment Expression of Interest for Price Cap Areas
Federated Telephone Cooperative (Minnesota Benson Exchange Project)

Dear Ms. Dortch:

Federated Telephone Cooperative hereby expresses an interest in participating in the Commission's rural broadband experiment to provide robust, scalable high-speed broadband to unserved/underserved high-cost areas with additional Connect America funding.

Background

Federated Telephone Cooperative (herein referred to as FTC) was formed as a cooperative in 1952 with five original exchanges. Today, FTC is a rural ILEC and CLEC serving ten (10) exchanges in West Central, Minnesota, all served by a Fiber To The Premise system. FTC's first deployment of the FTTP system commenced with one of the two initial RUS FTTH field trials in 1995. FTC has demonstrated 19 years of successful FTTP deployments, covering approximately 1,100 square miles, 1,800 miles of fiber and serving 3,900 subscribers.

If provided funding under the FCC Rural Broadband Technology Trials, our project will construct Fiber To The Premise throughout the entire Benson exchange, which we will extend off the FTTP network we already have in place.

Partners: Our partners in this project will be three (3) electric companies (Agralite Electric Cooperative, Benson Municipal Utilities and Otter Tail Power Company). This fiber network would be owned by FTC to provide voice and broadband services. Our partners, Agralite Electric Cooperative, Benson Municipal Utilities and Otter Tail Power Company, would use this fiber network as a test bed for implementing a Smart Grid technology to its electric customers, such as automated metering infrastructure (AMI), load control, and Smart Home technology. Electricity needs are no longer simple. Today's digital and computerized equipment and technology depend on an infrastructure that allows for two-way communication between the utility and its customers. Smart Grid technology also utilizes alternative renewable energy sources, and fortunately, Benson is home to FibroMinn, the first power plant in the North America designed to burn poultry litter as its main source of fuel. FibroMinn is owned and operated by ContourGlobal, an international company. Our proposed rural broadband technology trial sets an example world-wide for deploying a future-proof technology for the next generation, partnering

with electric providers to conserve energy and control costs, and the proposed area noted for the unique, innovative and revolutionary power plant which produces an alternative renewable energy source.

Our traditional ILEC territory borders the proposed area we are applying for, known as the Benson Exchange. We have been approached by several customers from the Benson exchange who have requested FTC's voice and broadband services. Our project not only would construct Fiber To The Premise to the cities of Benson, Clontarf, De Graff and Swift Falls, but throughout the rural areas as well. The project would pass an estimated 2,335 drops to residents, businesses and anchor institutions, carrying all traditional, 911, and IP traffic to the rest of the world on a redundant fiber network.

Upon completion of this proposed project, customers who would subscribe to FTC's services would be brought into the cooperative and have the same rights and privileges as existing members. FTC is designated as an Eligible Telecommunications Carrier (ETC) and has certificate of authority to provide services in the Benson, Minnesota exchange area.

Geographic Territory

The territory being considered for this field trial is the entire Benson exchange, located in West Central Minnesota. Complete or partial Census Tracts included in this exchange were listed in the eligible locations and are as follows:

MN	27151	Swift County	27151960100
MN	27151	Swift County	27151960200
MN	27151	Swift County	27151960300
MN	27151	Swift County	27151960400
MN	27121	Pope County	27121970300
MN	27023	Chippewa County	27023950500

There are four (4) towns included in the Minnesota Benson exchange which are Clontarf (POP 164; 1.96 square miles), De Graff (POP 115; 512 Acres), Swift Falls (POP 29; 100 Acres) and Benson (POP 3240; 2.019 square miles), with the city of Benson being the Swift County Seat. Not only will this project construct Fiber To The Premise to the residents of these four cities, but will construct Fiber To The Premise throughout the rural portion of the Benson exchange.

List of Anchor Institutions

The list of anchor institutions that are included in this territory being applied for include:

Schools

Heartland Girls Ranch	1400 Montana Avenue	Benson, MN 56215
Benson High School	1400 Montana Avenue	Benson, MN 56215
Northside Elementary School	1800 W Nevada Ave	Benson, MN 56215
Benson Day ALC	1400 Montana Avenue	Benson, MN 56215
School District Office	1400 Montana Avenue	Benson, MN 56215
Benson Christian School	1045 Pacific Avenue	Benson, MN 56215

Library

Benson Public Library	200 13th St N	Benson, MN 56215
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Health Care

Swift County Benson Hospital	1815 Wisconsin Avenue	Benson, MN 56215
ACMC-Benson	1810 McKinney Avenue	Benson, MN 56215
Country Side Public Health	201 13 th Street South	Benson, MN 56215

Government Centers

Swift County Courthouse	301 14th Street N	Benson, MN 56215
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Public Safety

Benson Fire Department	1411 Kansas Avenue	Benson, MN 56215
Benson Police Department	1410 Kansas Avenue	Benson, MN 56215
Swift County Sheriff's Office/ Swift County Jail	301 14th Street N	Benson, MN 56215
Clontarf Fire Department	301 West Grace Avenue	Clontarf, MN 56226
De Graff Fire Department	101 South 4th Street	De Graff, MN 56271

Other Non-Government

Fibrominn, LLC	900 Industry Drive	Benson, MN 56215
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Proposed Technology

FTC proposes to deploy Fiber To The Premise, which is a future-proof technology with virtually unlimited speeds. This network will be connected to an existing 10Gig ring for voice, data and IP technology providing a redundant ring. FTC will own the fiber network and work with our partners, Agralite Electric Cooperative, Benson Municipal Utilities and Otter Tail Power Company, to use the network to test and setup their Smart Grid service offering.

FTC's Proposed Offerings

\$18.00 per month	Residential Local Phone + Calling Features per Month
\$60.00 per month	Residential Bundle (Local Phone + Calling Features, 20 Mbps High Speed Internet, Long Distance Option)

FTC's Proposed Business Offerings

A loyalty discount is available to business members who subscribe to FTC for their local, long distance and Internet services. Signed contracts (provided by FTC) are required with term commitments. Gigabit connections will also be offered. Packages and pricing is yet to be determined based on similar offerings in our ILEC and CLEC service area.

Partner's Proposed Offerings

Electric Smart Grid by Agralite Electric Cooperative, Benson Municipal Utilities and Otter Tail Power Company

State and/or Local or Tribal Government Participation in and/or Support for Project

We will work with the city of Benson to apply for a Permit for construction in the City Right-of-Way and contact township Boards for any permits needed for construction in the townships relating to this project.

Existing Providers

The existing telecommunications providers for local voice is CenturyLink who offers Asymmetric xDSL broadband technologies with the most common advertised download speed of 768K-1.5 Mbps. MVTV

Wireless provides wireless Internet service via an Access Point located on a tower about 8 miles north of Benson, MN. In order to provide residents, businesses and anchor institutions with a robust reliable future proof network that would allow virtually unlimited options for future services and to provide a solution to meet their needs both now and in the future is a fiber network infrastructure, which is not provided by the existing provider.

Project Timeline

The construction of this project is ready as soon as funding is acquired and the necessary engineering and splicing contracts are put in place. FTC is experienced with Fiber To The Premise construction in both town and rural areas and has successfully completed 20 fiber construction projects. We are projecting the construction of this project to take two (2) years.

Scalability

A fiber network is future-proof and able to handle the technology and increasing bandwidth needs for the next generation. With the ever changing and increasing demands of electricity, a fiber infrastructure is best to implement a Smart Grid technology, which would conserve energy, improve restoration of power disturbances, control costs and improve security and public safety.

Total Utility Investment

\$4,320,390

One Time Capital Infrastructure Investment Needed

\$10,080,910

Total Project Cost

\$14,401,300

Federated Telephone Cooperative appreciates the opportunity to provide this non-binding expression of interest.

Sincerely,



Kevin Beyer
General Manager